

Dears Sirs,

My name is James Perryman. I am a licensed Amateur Operator of the Technician Class. I have been licensed for approximately 5 years now. I have also practiced as a Broadcast Communications Consultant for roughly 26 yrs. I feel that my unique situation will allow me to provide a few comments regarding the elimination of the Morse Code testing requirement to obtain General Class Operating Privileges.

I act as the Assistant Emergency Coordinator (AEC) for Stafford County, Virginia. My Emergency Coordinator is a US Federal Marshall. As such, if the "pooky hits the fan" so to speak... he will not be around to activate our Emergency Operations Center (EOC) to it's full operational ability. As a Technician, I cannot provide this level of service. Please let me assure you it is of the utmost importance that this capability is available in times of emergency. All long-distance communication is effected through the use of HF communications. We would be restricted to local communications exclusively. Without a General Class Licensee present we do not have the ability to operate within these very necessary bands. Therefore contact with District and Regional Coordinators will be severely hampered. We are having an ever increasingly difficult time enlisting the services of qualified HF operators. We do, however, have an abundance of Technician Class Operators who of are eager to volunteer both their time and services.

Through elimination the Morse Code testing requirement, it is much more likely that these potential volunteers will have the ability to upgrade to a General Class license. Thereby providing a much greater pool of properly licensed operators from which to draw upon in times of need. Thereby enhancing the ability of the Amateur Radio Service to provide timely and efficient communications services. I find this to be a particularly compelling argument for elimination of the Morse requirement. With the recent events of Hurricane Katrina and Hurricane Rita the need for these services is very evident.

I also find it interesting that many people comment that Morse Code is the only method of communication that functions in times of poor propagation conditions. While it may, in fact, be more readily useable mode of communication than a phone mode in certain circumstances.... It is not the "only" mode of communicating available. I would speak directly to the Digital Modes that are far superior and less prone to human induced errors than communication through use of Morse Code. Many of the proponents of this testing requirement for achieving General Class licensing would have you believe that when communication by Morse cannot be effectively accomplished, there is no other form available. This simply is not true. I know of no Morse operator who can copy information when the signal level drops below the ambient noise floor. Many of the Digital Modes currently in active use can achieve 100% accurate copy at levels approaching 23dB below the ambient noise floor. I have never met any Morse operator who can claim 100% perfect copy of information at this extremely weak signal level.

Therefore I would submit that Morse Telegraphy is simply a "mode of operation" that, while still very useful, is not the premiere method of accomplishing efficient transmission of information in a weak-signal environment. To this end should we require that any single mode of operation be required for licensing in the HF spectrum? I think not... Instead I feel that technical proficiency, and a working knowledge of The Rules we must operate under should be the sole testing requirement for licensing.

Therefore I strongly urge that The Commission adopt the elimination of Morse Code proficiency from the requirements for a General Class license.

Respectfully submitted,

James Perryman
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